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February 26, 2018

**Via ECF**

Honorable Deborah A. Batts  
*United States District Court Judge*  
United States District Courthouse  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

**Re: Baker v. Southern Wellcare Medical, P.C., et al**  
**Docket No. 17-CV-03220 (DAB)**

Dear Judge Batts:

This office represents the defendants in the above-titled action

We are scheduled to appear at a status conference before Your Honor on March 1, 2018 at 3:00 p.m. For that status conference Defendants are ordered to share the documents with the Defendant and the Court to determine whether this Court has jurisdiction in this matter.

We are writing to request an adjournment of this conference as this office is still gathering necessary documents from the clients. Specifically, for the client Southern Wellcare Medical P.C. ("Southern"), this office is waiting for the client to provide records of quarterly taxes paid for employees for years 2015-2016. However, Southern does not employ the services of any payroll company, such as ADP, but instead has their accountant perform payroll services for them. Southern is awaiting on their accountant to deliver those records, with an estimated delivery date of February 27, 2018.

Another defendant, Blue Medical Services, P.C. ("Blue") does not employ any full-time staff in their office. Instead, this office is gathering alternative records for individuals whose services were retained by Blue for years 2015-2016 with an explanation from an individual with personal knowledge with regard to what services were provided, amounts of hours worked by the particular individual, and the amounts paid.

We are requesting a two week adjournment from the date of March 1, 2018. This office conferred with Counsel for the Plaintiff, Mr. Caliste, who consented to this request. Mr. Caliste indicated that he will not be available on March 9, 13, 15, 20, 27. This office will make itself available on any other date provided by this Court.

There have not been any previous requests, for an adjournment from this office. There were two adjournments of the conference during the initial conference. There was one previous adjournment at the request of Plaintiff's office.

Thank you in advance for your courtesy. Should you have any questions, please contact my office.

Sincerely,

A handwritten signature in black ink, appearing to read 'Kadochnikov', with a long horizontal flourish extending to the right.

Alexander Kadochnikov